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and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER REGARDING SECOND
MOTION TO COMPEL COMPLIANCE WITH
COURT ORDERS**

This Document Relates to:

*Jane Doe LS 333 v. Uber Technologies,
Inc., et al.*, No. 3:23-cv-05930-CRB

*Jane Doe LS 397 v. Uber Technologies,
Inc., et al.*, No. 3:24-cv-05864-CRB

**[PROPOSED] ORDER RE SECOND MOTION
TO COMPEL COMPLIANCE WITH COURT ORDERS**

[PROPOSED] ORDER

Having considered Defendants' Second Motion to Compel Compliance with Court Orders, the Court finds that the Plaintiffs Jane Doe LS 333 and Jane Doe LS 397 have violated this Court's September 9, September 22, and November 19, 2025 Orders (ECF 3876, 3904 & 4443) by failing to produce responsive documents as ordered by this Court.

1. The Court therefore hereby ORDERS Plaintiffs Jane Doe LS 333 and Jane Doe LS 397 to comply with this Court's September 9, September 22, and November 19, 2025 Orders by producing the documents called for by the September 9 Order within five court days. If either Plaintiff takes the position that no responsive documents exist, that Plaintiff must provide a sworn declaration within five court days explaining why the documents identified by Uber in its Motion are allegedly not available for production. If either Plaintiff neither produces all responsive documents nor provides the declaration described herein, such Plaintiff(s) will be found in contempt of Court. Further proceedings will be addressed separately in the event either Plaintiff is in contempt of Court.
2. Each Plaintiff shall appear for deposition, as previously ordered by the Court for up to three hours, no later than 30 days after entry of this Court's order.
3. Plaintiffs' counsel shall provide within five court days a sworn declaration that addresses counsel's presuit investigation as to the claims of Plaintiffs Jane Doe LS 333 and Jane Doe LS 397, including a privilege log of all communications with each Plaintiff.
4. [Defendants defer to the Court to insert whatever relief and other language the Court deems necessary to address these Plaintiffs' fraud and non-compliance with Court orders, and to deter future fraud and noncompliance with this Court's orders.]

IT IS SO ORDERED.

Dated: _____, 202__

HON. CHARLES R. BREYER
United States District Court Judge